

**UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF ARKANSAS
HARRISON DIVISION**

In re: **Billy Scallorn**, Debtor
Chapter **13**, No. **3:22-bk-70129**

MOTION FOR RELIEF FROM STAY

COMES NOW Ford Motor Credit Company LLC ("Creditor"), by and through its undersigned counsel, NIXON, LIGHT & BUZBEE, PLLC and for its Motion for Relief from Stay, states and alleges as follows:

1. This motion constitutes a core proceeding pursuant to 28 U.S.C. 157(b)(2)(G), and this motion is also brought pursuant to 11 U.S.C. §362 and the applicable Federal Rules of Bankruptcy Procedure.

2. Debtor filed a petition for Chapter 13 relief on February 9, 2022. The debtor in this case is an individual.

3. Creditor is secured by a purchase money security interest in the following personal property:

2021 Ford F250, VIN 1FT7W2BT7MEC80265

4. Creditor's interest in the property is not adequately protected. The debt is depreciating faster than payments are being received.

5. The property may be uninsured. Proof of insurance required by 11 U.S.C. §1326(a)(4) has not been provided by the debtor.

6. The Debtor has no equity in the subject collateral and same is not necessary for the Debtor's reorganization.

7. Creditor hereby consents to the continuation of the automatic stay until a hearing is held on the merits of this motion and hereby waives its right to a hearing within thirty (30) days of the date of this motion as provided by Section 362(e)(1) of the Bankruptcy Code.

8. Creditor requests Rule 4001(a)(3) be waived and the stay lift be effective immediately upon entry of the order granting relief.

WHEREFORE, Creditor, Ford Motor Credit Company LLC, prays for relief from stay effective immediately upon entry of the order granting relief and for all proper relief.

Respectfully submitted,

NIXON, LIGHT & BUZBEE, PLLC
Attorneys at Law
10201 W. Markham, Suite 108
Little Rock, Arkansas 72205
501.376.3600 Telephone
john@nixonandlight.com

/s/ John B. Buzbee
John B. Buzbee (Ark. Bar 08045)

CERTIFICATE OF SERVICE

I, John B. Buzbee, hereby certify that a copy of the foregoing was filed via the Court's ECF system on the 14th day of February, 2022 and served on the following through the Bankruptcy Noticing Center and the debtor via First Class U.S. Mail:

Joyce Bradley Babin, Trustee, P.O. Box 8064, Little Rock, AR 72203-8064
Matthew Mentgen, Esq., P.O. Box 164439, Little Rock, AR 72216
Billy Scallorn, 239 CR 426, Berryville, AR 72616

/s/ John B. Buzbee